

**IN THE UNITED STATES DISTRICT  
FOR THE DISTRICT OF MARYLAND**

Charles Fenner Plaintiff  
3308 Fairview Ave Apt B  
Baltimore, MD. 21216

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OCT 16 2024  
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CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
BY DEPUTY  
FL

10/09/2024

United States District court  
District of Maryland  
Northern Division  
Clerk's Office  
101 W. Lombard Street  
Baltimore MD. 21201

Re: 1:24-cv-02714-JRR

**MOTION TO APPOINT FORENSIC AUDITOR**

Plaintiffs respectfully request that this Honorable Court consider the appointment of a forensic auditor to assist in this case. The purpose of this request is to accurately calculate the correct monetary compensation, time and other benefits owed to plaintiffs. The appointment of a forensic auditor is necessary to ensure an

accurate and impartial assessment of the damages due to the plaintiffs. Given the complexity and nature of the work performed by police emergency dispatchers and other similarly situated plaintiffs, this appointment is essential.

There are varying pay rates and other factors in each department covered under the Memorandums of Understanding (MOUs), which further necessitates the expertise of a forensic auditor. In support of this request, plaintiffs cite the case of *Novick v. Shipcom Wireless*, where an internal audit revealed misclassification of employees, leading to a favorable outcome for the plaintiffs. Plaintiffs assert that the defendants' internal audits are not sufficient to prevent discrepancies and ensure compliance with the Fair Labor Standard Act (FLSA).

For the reasons stated above, plaintiffs respectfully request that this Court appoint a forensic auditor whose expertise can ensure an accurate and impartial assessment of the damages due to the plaintiffs.

Respectfully submitted,

Charles Fenner Plaintiff



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

Fenner et al

v.

Baltimore Police Department et al

Case No. 1:24-cv-02714-JRR

**CERTIFICATE OF SERVICE**

I hereby certify that on October 09 2024, a copy of Motion to appoint Forensic Auditor

which was electronically filed in this case on N/A, was mailed via Certified mail first class mail, postage prepaid, to 100 Holliday St, Suite 101  
Baltimore, MD. 21202

10/09/2024

Date

  
Signature

Fenner et al

Printed Name and Bar Number

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